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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
In re:	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	Case No. 08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X	:	
In re:	:	SIPA Proceeding
	:	
LEHMAN BROTHERS INC.,	:	Case No. 08-01420 (JMP)
	:	
Debtor.	:	
	:	
-----X	:	

DECLARATION OF TODD R. GEREMIA

I, TODD R. GEREMIA, declare the following pursuant to 28 U.S.C. § 1746:

1. I am a partner in the law firm of Jones Day, special counsel for Movant Lehman Brothers Holding, Inc. ("Debtor") in the jointly administered bankruptcy proceeding *In re*

Lehman Brothers Holdings Inc., No. 08-13555 (JMP).¹ I submit this declaration to put before the Court certain documents referenced in the Reply Memorandum in Support of Motion *in Limine* for an Order Excluding the Expert Testimony of Professor Paul Pfleiderer (“Movants’ Reply”).

2. Any trial exhibits cited in Movants’ Reply as “M. ___” or “BCI Ex. ___,” which are in evidence, have not been attached to this declaration.

3. Attached hereto as **Exhibit 1** is a true and correct copy of deposition exhibit 802B, Barclays Capital Fixed Income Credit Products Price Testing Policy [BCI-EX-00297092 - 113].

4. Attached hereto as **Exhibit 2** is a true and correct copy of deposition exhibit 803B, Barclays Capital Global Financing Credit Products Price Testing Policy [BCI-EX-00297114 – 134].

5. Attached hereto as **Exhibit 3** is a true and correct copy of deposition exhibit 806B, Barclays Capital Product Control Price Testing Policy, dated May 2009 [BCI-EX-00297183 – 200].

6. Attached hereto as **Exhibit 4** is a true and correct copy of the deposition transcript of Richard Landreman, dated June 16, 2010.

¹ Debtor has moved for relief under Rule 60(b) of the Federal Rules of Civil Procedure. *See* Debtor’s Motion for an Order Pursuant to Fed. R. Civ. P. 60 and Fed. R. Bankr. P. 9024, Modifying the September 30, 2008, Sale Order and Granting Other Relief, (Bankr. S.D.N.Y. Sept. 15, 2009) (LBHI Docket No. 5148); Debtor’s Reply Brief in Further Support of Its Motion for an Order Pursuant to Fed. R. Civ. P. 60 and Fed. R. Bankr. P. 9024 (Bankr. S.D.N.Y. Mar. 18, 2010) (LBHI Docket No. 7641).

7. Attached hereto as **Exhibit 5** is a true and correct copy of the deposition transcript of Mark Washtell, dated June 17, 2010.

8. Attached hereto as **Exhibit 6** is a true and correct copy of the deposition transcript of Sean Teague, dated June 30, 2010.

9. Attached hereto as **Exhibit 7** is a true and correct copy of an excerpt of deposition exhibit 813B, an email between Michael Guarnuccio and Christopher A. Fisher, dated February 7, 2009 (10:14 a.m.) [PwC-BarCap 00011225 – 228].

10. Attached hereto as **Exhibit 8** is a true and correct copy of Barclays Capital Inc. Witness List annexed to Letter from J. Stern to T. Schaffer dated April 13, 2010.

11. Attached hereto as **Exhibit 9** is a true and correct copy of deposition exhibit 791, Declaration of Paul Pfleiderer, dated April 23, 2010.

12. Attached hereto as **Exhibit 10** is a true and correct copy of the deposition transcript of Uma Krishnan, dated June 29, 2010.

13. Attached hereto as **Exhibit 11** is a true and correct copy of the Expert Report of John P. Garvey, dated March 15, 2010.

14. Attached hereto as **Exhibit 12** is a true and correct copy the Declaration of Mark E. Zmijewski, dated July 15, 2010.

15. Attached hereto as **Exhibit 13** is a true and correct copy the Declaration of Mark E. Slattery, dated July 15, 2010.

16. Attached hereto as **Exhibit 14** is a true and correct copy the Declaration of Joseph Schwaba, dated July 15, 2010.

17. Attached hereto as **Exhibit 15** is a true and correct copy of the Expert Report of Mark E. Slattery, dated March 15, 2010.

18. Attached hereto as **Exhibit 16** is a true and correct copy of the Expert Report of John J. Olvany, dated March 15, 2010.

19. I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
July 16, 2010

/s/ Todd R. Geremia
TODD R. GEREMIA